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**Congress of the United States**  
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SUBCOMMITTEE ON FORESTS  
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COMMITTEE ON AGRICULTURE

SUBCOMMITTEE ON LIVESTOCK AND  
HORTICULTURE

August 20, 2004

NE NPR-A Amendment Planning Team  
Bureau of Land Management  
Alaska State Office  
222 West 7th Ave.  
Anchorage, AK 99513-7599

SD: ✓

ASD: DRD

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BLM AK SQ 952  
ANCHORAGE AK

Dear Planning Team,

001  
Alternatives

I strongly oppose your preferred alternative for amending the oil and gas leasing plan for the northeastern planning area of the National Petroleum Reserve-Alaska (NPR-A). I urge you to select Alternative A, the No Action Alternative, to sustain existing environmental and wildlife protection in the area, especially in the critical and fragile Teshekpuk Lake region.

002  
Alternatives

The preferred alternative reduces protections for the Teshekpuk Lake area by 75 percent. The 213,000 no lease zone is too small to protect the molting geese and waterfowl and caribou that seek refuge there. Tens of thousands of geese, including brant, greater white-fronted goose, Canada goose and snow goose, molt in this area. During this flightless time, the geese are very sensitive to disturbance. There are also many nesting birds in this area, such as the threatened spectacled eider, yellow-billed loons and buff-breasted sandpipers. These species will also suffer from disturbance and the increased number of predators (e.g., gulls, ravens, and foxes) that are attracted to oilfields.

003  
Birds

These waterfowl are important to many throughout North America. The native Alaskans rely on many species for subsistence. Additionally, these migratory birds are important to recreational hunting, viewing and education. Any oil and gas activities that will negatively affect the populations of the migratory birds that depend on the NPR-A should be prevented.

004  
Alternatives

Further, the preferred alternative would diminish protection for the caribou by opening up part of their critical calving and insect relief areas. Most of the concentrated calving area would now be open to leasing and industrial development in contrast to the 1998 ROD, which protected most of the concentrated calving area either in no-surface activity or no-leasing restrictions. For example, according to data analyzed by the Audubon Society, under Alternative A, 74 percent of the concentrated calving area (as defined by the University of Alaska Fairbanks, 2001) was protected. In contrast, under BLM's preferred alternative, only 12 percent of this sensitive area is protected. Thus, 88 percent of the Teshekpuk Lake herd's concentrated calving area would be at risk.

005  
Alternatives

Important caribou insect relief habitat would also be open to leasing and industrial development under the preferred alternative. Alternative A protected 84 percent of the herd's insect relief habitat (as defined by maps prepared by ADF&G, NSB, ABR, 2003). BLM's Preferred Alternative significantly reduces that protected area; only 41 percent of insect relief habitat is now protected from leasing and industrial development.

006  
Caribou

BLM has not provided any new scientific data to support or justify reducing the protections for these important caribou habitats. BLM's preferred alternative places the Teshekpuk Lake herd at risk of being displaced from their calving grounds and by disrupting their movements during the critical insect season. As a result, significant displacement and disturbance during calving and insect seasons would likely result in declining herd productivity, resulting in population-level impacts to the herd.

007  
Caribou

It is important to maintain high productivity in the Teshekpuk Lake herd because it is a very important subsistence resource and is harvested at a higher rate than other arctic caribou herds. A high level of harvest can be maintained only if productivity remains high. The National Research Council (2003) concluded that productivity was reduced in the segment of the Central Arctic herd exposed to oil development because of displacement from their calving area and hindrance to moving to and from insect relief areas.

008  
Subsistence

The Alaskan natives of Nuiqsut and Barrow rely on the caribou from the Teshekpuk Lake herd for their survival. The residents of Nuiqsut already have to travel further and further to find caribou due to the encroaching oil and gas development near their village. The longer they have to travel, the more time they are away from their families and jobs. In addition, they are more exposed to the elements and risk having the meat spoil more quickly. If more development is allowed, these problems will only continue to get worse and further impact the Inupiat way of life.

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Back in 1998, the Pacific Flyway Council, consisting of waterfowl biologists and wildlife managers from state and provincial wildlife agencies, recommended that the Teshekpuk Lake Special Area not be opened to oil and gas leasing to protect molting geese and further be given permanent protection from future development by Secretarial designation. Ever since then, the cumulative impacts of drilling have accumulated, as reported in the 2003 National Academy report, *Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope*. The report also states that environmental damage will continue to grow as more development is allowed in this fragile landscape.

010  
Planning

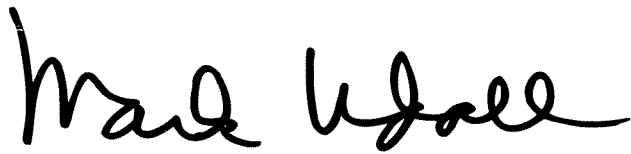
Eighty-seven percent of the northeastern Reserve is already open to oil and gas companies for leasing. There is no science indicating that the sensitive areas now closed to leasing can be opened without impacting wildlife. In fact, in the five years since the 1998 northeast plan, additional information and analyses point toward significant impacts on fish and wildlife if more of this sensitive area is opened. It would be a mistake to risk the internationally significant

ecological resources of Teshekpuk Lake for short-term supply of energy, especially when we know that the United States cannot drill its way to energy independence.

11

Again, I urge you to choose Alternative A, the "No Action" alternative, to protect the reserve's irreplaceable wildlife, wilderness and subsistence values for future generations.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Udall". The signature is fluid and cursive, with the first name "Mark" and last name "Udall" clearly distinguishable.

Mark Udall